

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT OF
FOR THE WESTERN DISTRICT OF OKLAHOMA

SEAN SMITH and CRYSTAL
SMITH,

Plaintiffs,

VS.

CSAA FIRE & CASUALTY
INSURANCE COMPANY,

Defendant.

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Case No. 5:17-cv-1302D



DEPOSITION OF CHAD WHITE HECKMAN
TAKEN ON BEHALF OF THE PLAINTIFF
IN OKLAHOMA CITY, OKLAHOMA
ON OCTOBER 23, 2018

REPORTED BY: SUSAN J. FENIMORE, CSR, RPR

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1 you from when you -- on Page 6, before you make the
2 call to Rimkus and before, that's the evidence you
3 had from the insured, right?

4 A Yes.

5 Q Unless there's something else in this claim
6 file that shows that you talked to them, which I
7 don't think there is, but we're going to go through
8 it, okay? But when you say the statements of the
9 insured, that's what you're referring to?

10 A The statements from the insured about the
11 damages they are claiming, yes.

12 Q So you had the Rimkus report and the claim
13 file notes prior to you calling Rimkus?

14 A No, I did not have the engineer report. I
15 had the insured's statement.

16 Q Well, I mean, when you were making a
17 coverage determination at the very end, you had the
18 Rimkus report and the statements prior to you calling
19 Rimkus?

20 A Correct.

21 Q Now, on 8-28, after your call with Mr. and
22 Mrs. Smith, you called Rimkus Engineering?

23 A Consulting, yes.

24 Q Consulting.

25 Have you ever used Rimkus Engineering

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1 before?

2 A I don't believe so.

3 Q You know, it's -- how did you get the name
4 Rimkus Engineering then?

5 A In the senior position we had a list of
6 different companies and we had their names and then
7 notches there, so if they were used, then we'd go to
8 the next one. And we just kept doing that to keep
9 using different companies and experts, as long as
10 they were available or in that state. Because some
11 states, if they were next in line, they might not be
12 in that state, so then we'd maybe have to skip them.
13 But we would try to move it, you know, continuously
14 changing.

15 Q Where is this list at? Is it like on a dry
16 erase board somewhere?

17 A Yeah, it was just a piece of paper that
18 just the senior -- because the senior adjusters sat
19 together, so it was a little list that they kept for
20 each other just to make sure we're going through in
21 different experts or people that we're using.

22 Q How many names were on the list?

23 A I know that there were four. I can't
24 remember two of the names. I know that Rimkus was on
25 there and Donan, but I don't know the other two. I

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1 we're just not using the exact same one every single
2 time, but I'm not forced to use those four engineers,
3 either.

4 Q But then again, you've never used anyone
5 off that list to investigate an Oklahoma claim?

6 A But I've only sent out a few. I've only
7 had a few claims that I had to have engineers on.
8 And, again, in that position for a earthquake, that
9 was positive -- pretty positive that was my first
10 claim for having to send out for an earthquake.

11 Q Who did you send out on the other
12 earthquake claim?

13 A I don't recall.

14 Q That's okay. But, again, you don't know
15 how this list was compiled, do you?

16 A No.

17 Q I want to keep going through the notes
18 here. It says you called Rimkus Engineering, did you
19 specifically request Lisa Holiday?

20 A No. The process is I give them the -- tell
21 them I need to have them go out to a property.
22 They -- I give them the address, claim number,
23 insureds' name and their contact information and just
24 explain to them that it's for earthquake. I don't
25 give them much more details, just that, and then they

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1 say, okay, we'll assign someone. That's all I do. I
2 don't get anything else with that.

3 Q So we're working up the list. It says
4 on -- the engineer's going to inspect on 9-1-17?

5 A Okay. Yeah.

6 Q Do you see that?

7 A Yes.

8 Q That's from Clorice?

9 A Uh-huh.

10 Q And it looks like you had a claim file note
11 on the day of the inspection, which is 9-1, right?

12 A Yes.

13 Q She called and left you a voice mail, you
14 called and left her a voice mail, right?

15 A Uh-huh.

16 Q A little bit of phone tag here?

17 A Yes.

18 Q But she's calling you at 1:00 p.m. the day
19 of the investigation.

20 A That's where I put my note when I most
21 likely listened to her voice mail.

22 Q So she would have called you prior to 1:12
23 p.m.?

24 A Correct.

25 Q Then it looks like she ended up getting